

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: OLYMPIA L KEYES

) Case No. 17 B 36221  
)  
Debtor ) Chapter 13  
)  
) Judge: DONALD R CASSLING

**NOTICE OF MOTION**

OLYMPIA L KEYES  
4941 W WESTEND AVE #3E  
CHICAGO, IL 60644

DAVID M SIEGEL  
via Clerk's ECF noticing procedures

Please take notice that on March 22, 2018 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on February 14, 2018.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On December 06, 2017 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan - need tax language; #5.1 - not filled out; #7.1 - not filled out and plan not feasible with IRS claim.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn